

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

WILLIAM C. BOND,

*

Plaintiff *Pro Se*

v.

*

Civil Action No.: MJG-01-CV-2600

KENNETH BLUM, SR., et al.

*

Defendants

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**MOTION FOR DISCOVERY, MOTION FOR DISCOVERY OF THE UNITED STATES
ATTORNEY'S OFFICE FOR MARYLAND, AND MOTION FOR DISCOVERY UNDER
FED. R. CIV. P. RULE 27**

1. Plaintiff incorporates his Motion and Memorandum in Support of Motion for Fed. R. Civ. P. Rule 60 (b) Relief from Judgment or Order.
2. Plaintiff incorporates his Renewed Motion to Recuse and Motion for Case to be Specially Assigned to a Visiting Judge or that the Court Grant a Change of Venue.
3. Plaintiff incorporates his Motion for Permanent Injunction and Restraining Order and Request for Hearing.
4. Plaintiff asks this Court to allow Post Judgment and/or new Trial Discovery for all Copyright Defendants regarding issues raised by Plaintiff's Motions and to allow Interrogatories,

Depositions, Production of Documents, and to allow Subpoenas of Telephone Records.

5. Plaintiff asks this Court to allow Post Judgment and/or new Trial Discovery for Copyright Witnesses, Other Persons, and Attorneys regarding issues raised by Plaintiff's Motions, including Miriam Pessin, David N. Pessin, Robert Grossbart, Lisa Grossbart, Rita Mathews, Erlene Blum, Alan Cohn, Robin Cohn, James Robinson, Gerard P. Martin, William McDaniel, Brian DeLeonardo, Cpl. Hughs, and others as may be necessary; and to allow Depositions, Production of Documents, and to allow Subpoenas of Telephone Records and Billing Records where necessary.

6. Plaintiff asks this Court to allow Post Judgment and/or new Trial Discovery for the United States Attorney's Office of Maryland regarding all information pertaining to Plaintiff's complaints and all information regarding supervisory communications about Plaintiff's complaints both from the United States Attorney's Office in Maryland and from the DOJ in Washington. Plaintiff asks for all Documents listed above to be produced by any member of the United States Attorney's Office in Maryland or DOJ in Washington who may be in Possession of such Documents. Plaintiff requests Depositions regarding this information and Plaintiff's complaints, in general, and asks to depose former US Attorney for Maryland, Thomas M. DiBiagio, Barbara S. Sale, Chief, Criminal Division, US Attorney's Office for Maryland, and two (2) AUSAs, "Jane Doe" a.k.a. "Piranha," and "John/Jane Doe."

7. Under Fed. Rule 27, Plaintiff seeks Interrogatories, Depositions, Document Production, and Subpoenas for Telephone Records from United States District Judge Marvin J. Garbis and Gerald

A. Messerman, Esq., regarding all information related to Plaintiff's allegations in his incorporated Motions..

WHEREFORE, for the aforementioned reasons, Plaintiff respectfully asks this Court to Grant his discovery requests and to order the Clerk to prepare the appropriate subpoenas.



WILLIAM C. BOND

Pro Se

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of April, 2007, copies of Plaintiff's MOTION FOR DISCOVERY, MOTION FOR DISCOVERY OF THE UNITED STATES ATTORNEY'S OFFICE FOR MARYLAND, AND MOTION FOR DISCOVERY UNDER FED. R. CIV. P. RULE 27 were mailed FedEx, postage prepaid, to William F. Ryan, Jr., Esquire, Amy E. Askew, Esquire, Whiteford, Taylor & Preston, LLP, Suite 1400, 7 St. Paul Street, Baltimore, Maryland 21202-1626, attorneys for McDaniel, Bennett & Griffin; Gerard P. Martin, Esquire, Thy C. Pham, Esquire, Rosenberg, Martin, Funk & Greenberg LLP, 25 South Charles Street, Suite 2115, Baltimore, Maryland 21201-3322, attorneys for Defendants, Dudley F. B. Hodgson, Kenneth Blum, Sr. and Kenneth Blum, Jr.; Andrew Radding, Esquire, Michael R. Severino, Esquire, Adelberg, Rudow, Dorf & Hendler, LLC, 600 Mercantile Bank & Trust Building, 2 Hopkins Plaza, Baltimore, Maryland 21201-2927, attorneys for Defendant, Adelberg, Rudow, Dorf & Hendler, LLC; and Kathryn Miller Goldman, Esquire, Jiranek, Goldman & Minton, LLC, Suite 401, 19 E. Fayette Street, Baltimore, Maryland 21202-3316, attorneys for William Slavin; AND TO: Gerald A. Messerman, Esq., Messerman & Messerman Co., L.P.A., 127 Public Square, 4100 Key Tower, Cleveland, Ohio, 44114; Allen F. Loucks, Chief, Civil Division, United States Attorney, District of Maryland, Northern Division, 36 South Charles Street, 4th Floor, Baltimore, Maryland, 21201, and via hand delivery to Judge Marvin J. Garbis, United States District Court for the District of Maryland, Baltimore Division, 101 west Lombard Street, Baltimore, Maryland, 21201



WILLIAM C. BOND